

CSBG eligible entities scheduled to be monitored in calendar year 2015:

CSBG Board of Directors of Albany County
Campbell County CARE Board
Carbon County Community Action Committee
Converse County Human Resources Council
Fremont County Action Committee
Community Action of Laramie County
Community Action Partnership of Natrona County
Northern Arapaho Human Services Commission
Sheridan County Tripartite Board

CSBG eligible entities scheduled to be monitored in calendar year 2016:

Goshen County
Hot Springs County
Community Resource Center of Johnson County
Niobrara County
Northwest Community Action Programs of Wyoming, Inc. (NOWCAP)
Teton County Tripartite Board
Washakie County
Weston County

Monitoring activities include (but are not limited to) the following:

1. verification of grantee contract compliance;
2. observation of grantee service provision and types of assistance provided;
3. provision of training and technical assistance in direct services and administrative areas by the eligible entity for its staff persons and for its subcontractors;
4. attendance at regularly-scheduled governing board meetings, to observe board functioning and operation to verify consistency with the provisions of proper Tripartite Board practices and procedures;
5. review of governing board files to verify board composition and to review minutes for verification of proper board practices;
6. review of client and related program files to ensure appropriate paper trails, with emphasis on case management;
7. one-on-one contact with eligible entities and subcontractors (to the extent practicable) staff persons for the purpose of soliciting input with regard to program performance and other areas;

8. one-on-one contact with current program clients and/or ex-clients (to the extent practicable) for the purpose of soliciting input as to opinions about program effectiveness, and related areas;
9. confirmation of each eligible entity's (and subcontractor's) last audit, and the period covered;
10. conversations with staff members of eligible entities and subcontractors for the purpose of ascertaining what kinds of training and technical assistance is needed;
11. on-going (meaning daily) contact with eligible entities and subcontractors by telephone, in writing, or at information-sharing meetings;
12. collection of data and information from eligible entities and subcontractors (i.e., monthly performance and fiscal reports) in addition to other information either requested or voluntarily submitted to CSP; and
13. review of annual grant applications to assure compliance with federal and state assurances, and all applicable requirements of the CSBG Act.

Monitoring/Fiscal:

The fiscal monitoring system is essentially the same as the "Performance Monitoring" system. It would not be remiss to address only one and not the other inasmuch as they are totally interrelated. Information from both areas is needed in order to assess program compliance with requirements and standards.

A systematic payment process is in place which enables CSP to easily monitor the financial status of all eligible entities and provide reports of their status as necessary. Initial payments are paid upon execution of the contractual agreements and subsequent payments are paid after 20%, 45% and 70% of the entire grant is expended. The payment process is approved by the WDH Fiscal Unit.

Fiscal report and data are also reviewed and controlled by the Wyoming Department of Health (WDH) Fiscal Unit, in addition to CSP. The State Auditor's Office also has the responsibility of overseeing all state fiscal processes, be they State Government, or public funds that are allocated to state contractors.

Evaluation:

The evaluation function will be conducted essentially like the monitoring process except that formal written evaluation of programs will be established at designated times. They will be conducted annually, at a minimum.

Basically, the state level evaluation system will be one of measuring actual outcomes and performance measurements (or targets) against planned outcomes of goals and objectives, and measurements, impact of programs on the community, compliance with all applicable requirements, and other appropriate measurements.

The key to the evaluation process will be through its correlation with *WyoROMA* practices and systems.

2. Corrective Action/Sanctions/Termination and Reduction of Funding:

The CSBG Act created an entirely new process for identification and correction of an eligible entity's deficiencies. This process will be followed before initiation of funding termination or reduction proceedings. This process should be of substantial help in correcting problems before they become so severe as to cause a loss of funding, or worse.

The trigger for the process is a final decision by CSP, based on a review that reveals an entity failed to:

- comply with the terms of a contract or the State Plan;
- provide CSBG services; or
- meet the State's appropriate standards, goals, or other requirements, including performance objectives.

If such is the case, CSP will:

- inform the entity (or entities, as appropriate) of the deficiency or deficiencies to be corrected;
- require the entity to correct the deficiency;
- offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to HHS/OCS a report describing the training and technical assistance offered; or if CSP determines that such training and technical assistance are not appropriate, it will prepare and submit to HHS/OCS a report stating the reasons for the determination.

CSP may, at its discretion, taking into account the seriousness of the deficiency and the time reasonably required to correct it, allow the entity or entities to develop and implement, within sixty (60) days of being informed of the deficiency, a plan to correct the deficiency within a reasonable period of time.

CSP will, not later than thirty (30) days after receiving from an eligible entity a proposed quality improvement plan (corrective action plan), either approve such proposed plan or specify the reasons why the proposed plan cannot be approved.

If the entity does not correct the deficiency, CSP will, after providing adequate notice and an opportunity for a hearing (through the CSBG Hearing/ Appeal Process of the State Plan), initiate proceedings to terminate the designation of, or reduce the funding, as appropriate.

Before terminating or reducing funding, CSP must determine that “cause” exists and, if the entity so requests, submit the decision to HHS/OCS for review. The HHS/OCS must complete the review within ninety (90) days of receiving necessary materials from the State; otherwise the State’s determination becomes final. For purposes of both funding reductions and termination, “cause” exists where an entity has not complied with a State requirement or the terms of an agreement (contract) or the State Plan. Official definition of “cause” follows.

For purposes of making a determination in accordance with the CSBG Act with respect to:

- (1) a funding reduction, the term “cause” includes--
 - (A) a state-wide redistribution of funds provided through the CSBG to respond to--
 - (i) the results of the most recently available census or other appropriate data;
 - (ii) the designation of a new eligible entity; or
 - (iii) severe economic dislocation; or
 - (B) the failure of an eligible entity to comply with the terms of an agreement or the State Plan, or to meet a state requirement, as described in section 678C(a) of the CSBG Act; and
- (2) a termination, the term “cause” includes the failure of an eligible entity to comply with the terms of an agreement or the State Plan, or to meet a State requirement, as also described in section 678C(a) of the CSBG Act.

If CSP terminates or reduces funding without providing the required hearing or HHS/OCS review, HHS/OCS may directly fund the eligible entity until the violation is corrected. If that happens, the next year’s allocation to the State will be reduced by an amount equal to the funds provided to the eligible entity.

CSP ensures compliance with this assurance through consultation, advice, and direction from the State Assistant Attorney General who is designated as the liaison to the CSBG through the Office of the Attorneys General. In addition, CSP will utilize its CSBG “Appeal/Hearing Process”

commensurate with the requirements of Section 678(c)) of the CSBG Act.

3. Fiscal Controls, Audits, and Withholding:

The CSBG Act's provisions concerning fiscal control, procedures, audits, inspections, and withholding are substantially the same as before, but have been reorganized into a single section.

The State is required to:

1. establish fiscal control and fund accounting procedures necessary to assure the proper disbursement of and accounting for federal funds paid to the State, including procedures for monitoring the funds provided to the State;
2. ensure that cost and accounting standards of the Office of Management and the Budget (OMB) apply to CSBG fund recipients (both eligible entities/contractors, and subcontractors);
3. prepare an audit at least yearly, which is an audit of the expenditures of the State of amounts received under the CSBG Act, and amounts transferred to carry out the purposes of the CSBG Act; and
4. make appropriate books, documents, papers, and records available to the HHS/OCS and the Comptroller General of the U.S., or any of their duly authorized representatives, for examination, copying, or mechanical reproduction on or off the premises of the appropriate entity upon a reasonable request for the items.

Each audit required shall be conducted by an entity independent of any agency administering activities or services carried out under the CSBG Act and shall be conducted in accordance with generally accepted accounting principles. Audits shall be conducted in the manner and to the extent provided in chapter 75 of title 31, U.S. Code (commonly known as the "Single Audit Act Amendments of 1996").

Within thirty (30) days after the completion of each such audit in the state, the State shall submit a copy of such audit to any eligible entity that was the subject of the audit at no charge, to the Wyoming State Legislature, and the HHS/OCS.

The State shall repay to the Federal Government amounts found not to have been expended in accordance with the CSBG Act or the HHS/OCS may offset such amounts against any other amount to which the State is or may become entitled under the CSBG Act.

The HHS/OCS may withhold funds from the State if, after providing adequate notice and an opportunity for a hearing conducted in the state, it determines that the State has not used its CSBG funds in accordance with the CSBG Act provisions, including the State's assurances. This standard is lower than the previous one, which permitted withholding only where the State's utilization of funds was not

substantially in accordance with the CSBG Act. It may, therefore, now be easier for HHS/OCS to withhold funds from the State.

The HHS/OCS must respond in an expeditious and speedy manner to complaints of a substantial or serious nature that the State has failed to use funds in accordance with the provisions of the CSBG Act, including the assurances provided by the State. A complaint of a failure to meet any one of the assurances provided by the State is considered a serious complaint.

If the HHS/OCS determines that there is a pattern of complaints of failures described in the previous paragraph, they shall conduct an investigation of the use of funds received under the CSBG Act in order to ensure compliance with the provisions of the Act.

The State will permit and cooperate with federal investigations undertaken in accordance with 678D of the Act (Assurance 676(b)(7)). In the event of an investigation, the State of Wyoming will make available to federal investigators all required records and documents, as required by State-local (eligible entities and subcontractors) as appropriate.

WDH has chosen to include the audit of all of its block grants, including the CSBG, as part of its annual Department wide audit. The following audit standards apply to all funds flowed through the WDH to grantees (eligible entities) and subcontractors.

Audit Standards

Service providers who spend \$750,000 or more in federal assistance annually must comply with the requirements set forth in OMB Circular A-133, regardless of the amount of state assistance also received. The ceiling of \$750,000 means federal funds from all sources, not just the CSBG.

H. ACCOUNTABILITY AND REPORTING REQUIREMENTS

1. Results Oriented Management and Accountability Federal Mandate:

This federal assurance mandates that the State and all eligible entities in the state will participate in the Results Oriented Management and Accountability (ROMA) System or another performance measure system for which the Secretary of the HHS facilitated development pursuant to Section 678E(b) of the Act. Wyoming's method of measuring outcomes regarding the eligible entities performance in promoting self-sufficiency, family stability, and community revitalization is WyoROMA. Such measures will measure performance toward meeting the Six National Goals of the CSBG, as follows:

Six National Goals

- Goal 1.** Low-income people become more self-sufficient. **(Self-Sufficiency)**
- Goal 2.** The conditions in which low-income people live are improved. **(Community Revitalization)**
- Goal 3.** Low-income people own a stake in their community. **(Community)**
- Goal 4.** Partnerships among supporters and providers of services to low-income people are achieved. **(Agency)**
- Goal 5.** Agencies increase their capacity to achieve results. **(Agency)**
- Goal 6.** Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems. **(Family Stability)**

CSP and its eligible entities began using ROMA until the creation of WyoROMA. CSP developed this system as a management tool for all CSBG participants, both eligible entities/contractors, and subcontractors. It is a performance measurement system that is used by the State and its eligible entities to measure their performance in carrying out the CSBG requirements and in achieving the goals of their community action plans.

All eligible entities and subcontractors are required by the State Plan to submit their applications for funding and their monthly progress reports in the WyoROMA format.

ROMA:

Through the Results-Oriented Management and Accountability (ROMA) System presented by the U.S. Department of Health and Human Services (HHS), Office of Community Services (OCS); the following definitions were developed by The Rensselaerville Institute:

Outcome Statement: An inspiring statement that defines the broad end state sought in customer terms (i.e., self-sufficiency, graduates and gets a job with career potential, etc.)

Performance Target: Defines success for your program in terms of what the customer will actually achieve (get & keep employment for 1 year).

Milestones: Specifies actions, the steps, the small changes along the way most customers will need to take to reach performance target.

Planning Process:

Since the Federal Fiscal Year 1999 State Plan, providers of services utilizing federal CSBG funding have been reporting accomplishments through the Results-Oriented Management and Accountability (ROMA) planning process developed in accordance with the Government Performance and Results Act of 1993 (GPRA), as modified by the *WyoROMA* system developed by CSP. This system allows participants in the Wyoming CSBG Program to plan, conduct, evaluate, and report on activities in a fashion that will meet the requirements of both strategic planning and federal ROMA.

Strategic Planning:

The State of Wyoming has developed, and utilizes as its primary management tool, a strategic planning process as authorized by Wyoming Statute 28-1-116(a). Within that strategic plan, the Department of Health (WDH) has established, through its 2013-2014 Strategic Plan, a mission to promote, protect, and enhance the health of all Wyoming residents. WDH serves people from locations all around the state (e.g., Public Health Nursing offices, etc.). The core values of the WDH include integrity in all relationships, fairness, confidentiality, professionalism, and an aversion to discrimination. The WDH promotes a culture centered on a preventative approach to solving health problems, fiscal and program accountability, and concern for healthcare issues as they impact Wyoming's residents.

As a program within the Department of Health, the Community Services Program was tasked with developing a strategy to provide local participants with the tools to identify and help eliminate poverty-related problems by using available local, state, federal, and private resources; and toward meeting a departmental objective to establish, maintain and promote the development of a comprehensive range of quality services and supports throughout Wyoming which stress independence, dignity and security.

As part of the Strategic Planning Process, and to assist local participants in developing Goals, Objectives, Strategies, Outcomes, and Outputs, the Community Services Program developed the following set of definitions:

Goals: A Goal is the general end toward which efforts are directed, and addresses the primary issue or problem to be solved. It is both qualitative and quantifiable, but need not be quantified (measurable).

Objectives: An Objective is a clear target for specific action. It is linked directly to the goal and is quantified (measurable) as a time-based statement of intent, emphasizing the results to be achieved by that action at the end of a specific time.

Results: A Result is an indicator of the actual impact or effect of an action on a stated condition or problem. It is a tool to assess the effectiveness of an action and/or the public benefit to be derived from that action. It is typically expressed as a percentage, rate, or ratio.

Measures: A Measure is a tool for counting the services and goods produced through an action. The number of people receiving a service and the number of services delivered are often used as measures.

Strategies: A Strategy is a method for achieving goals and objectives. It is used to demonstrate the process for transforming activities into measures (achievements) and ultimately into priorities (results) that cause the objectives, and ultimately the goals, of a program to be accomplished. It reflects cost/benefits and best use of financial and other resources, or the chronology of activities.

WyoROMA:

The Wyoming Community Services Program developed, and will utilize as a management tool for all CSBG participants, a system that coordinates the components of both the Wyoming Strategic Plan and the CSBG ROMA. Using that system, local participants of the Wyoming CSBG Program will report in a manner compatible with both designs and that can be reported out to both the executive and legislative branch of Wyoming state government in Strategic Planning terms; and to the federal CSBG in ROMA terms. That management system is known as WyoROMA.

For FFY 2015, the Wyoming Community Services Program set the following as evaluation units for the State Strategic Plan:

Goal: To make a measurable impact on poverty by using all available local, state, private and federal resources to provide services and activities to remove obstacles and solve problems, thereby enabling low-income families and individuals to become self-sufficient.

Objective: That 20% of eligible clients served by local CSBG-funded programs will be moved toward self-sufficiency.

Results: To provide guidance, funding assistance, and oversight to local communities who have the ability to offer services to the state's low-income population in a cost-beneficial manner.

Measures: Outputs for measuring the achievement of Wyoming's CSBG Program include the following:

- 7,250 low-income persons will receive assistance toward becoming more self-sufficient;
- 6,250 low-income persons will receive assistance toward improving their status within the community;
- 4,250 low-income persons will receive assistance toward owning a stake in their community;
- 5,500 low-income persons will be assisted through partnerships among service providers;
- 5,000 low-income persons will be assisted through inter-agency coordination; and
- 7,000 low-income persons will be assisted through systems to strengthen family stability.

Strategy: To provide guidance, funding assistance, and oversight to local communities who have the ability to offer services to the State's low-income population in a cost-beneficial manner.

Because the activities that will cause impact against state-wide CSBG goals, objectives, and performance targets are conducted within local communities under the auspices of local governments; success of the program depends on a close working relationship between community personnel and the Wyoming Community Services Program. Fortunately, this necessary cooperation exists as a result of several years of conducting CSBG activities in this manner.

Because a successful management system must be dynamic (that is, it must be flexible enough to allow for internal changes and modifications without damage to the entire system), it is essential that oversight agencies recognize the importance of local control of community programs. Wyoming has long been an advocate of problem solving through coordinative efforts of state and local entities; and our sparse population allows a close working relationship with service providers and decision makers within local communities.

General direction is provided by the Wyoming Community Services Program to guide local communities in regard to fiscal accountability, performance efficiency, and program effectiveness. Within those guidelines, the service providers carry both authority and responsibility for fiscal and performance results. By definition (at its most basic level) accountability answers the question, "Did we do the job right?"; efficiency answers "Did we do the job well?"; and effectiveness answers "Did we do the right job?"

Within that concept of accountability, efficiency, and effectiveness; decisions made and actions taken by the state relative to services provided through the use of CSBG funds must reflect the following:

- Both targeted and non-targeted community residents will be extensively involved in all major program decisions;
- Use of funds must assure that neither sponsors nor participants are dependent on long-term availability of those funds;
- Funds will be directed toward problem solving and capacity building within local communities, focusing on both target and non-target populations;
- Current and prospective program sponsors will be provided the necessary materials, training, and guidance for proper utilization of funds;
- Program activities will complement and be coordinated among Wyoming Indian and non-Indian organizations;
- No major amendments will be made to the CSBG State Plan without prior consultation by the State with current and prospective program sponsors;
- State policies relating to the expenditure of CSBG funds will be limited to those that are essential to meet the requirements of the Act and the State Plan or to ensure that proper management standards are met;
- No major CSBG-related policy decisions will be made by the State without consulting with local governments, interested citizens, and other eligible entities and appropriate persons and organizations; all of whom will be provided opportunity for review of and comment on pertinent documents and materials;
- CSBG-funded activities will be state-wide in nature with funding made available to all geographic areas of Wyoming based on poverty factors and need for services in each area;
- CSBG activities will be determined by local authority, providing that those activities are completely within the intent of the Act;
- Fiscal and program activities conducted within participating communities will meet the highest practical quality standards; and
- All CSBG-funded activities will be consistent in all aspects with the provisions and the intent of the Act, the State Plan, and local Work Plans approved by the State.

2. **Annual Report:**

Consistent with the requirements of section 678E(a)(2) of the Act, CSP will prepare and submit to HHS/OCS an annual report on the measured performance of the State and its eligible entities and subcontractors. The report will address Congressional reporting requirements, and will include, at a minimum, information that is pertinent and comprehensive, and which describes in detail CSBG activities and services as well as addresses outcomes, which measure how CSBG funds were used to promote self-sufficiency, family stability, and community revitalization.

The HHS/OCS will prepare annually, either directly or by grant or contract, a report for submission to Congress (Committee on Education and the Workforce of the House of Representatives and the Committee on Labor and Human Resources of the Senate). The report will include summaries of both the planned and actual uses of CSBG grants to the State, with a breakdown of funds actually spent on administrative costs and on direct delivery of local services by eligible entities and subcontractors (as applicable), and a comparison of planned versus actual uses. The report must also contain information on the number of entities eligible for CSBG

funds, the number of low income people served, and other demographic data, and a summary of the State's eligible entity and subcontractor performance results.

The State of Wyoming's annual report will contain:

- a report on the measured performance of the State, its eligible entities, and subcontractors;
- an accounting of the expenditure of CSBG funds, including those funds spent on administrative costs by the State, its eligible entities, and subcontractors;
- an accounting of funds spent by the eligible entities on the direct delivery of local services;
- information on the number and characteristics of CSBG clients;
- a summary of training and technical assistance offered by the State to eligible entities to correct deficiencies;
- summaries of the planned and actual uses of CSBG funds. Although this is not required by the CSBG Act, HHS/OCS will require the State to include this information in its annual report since HHS/OCS is now required to include such information in its report to Congress.

Prior Year Review:

Wyoming's FFY 2014 CSBG Program is due to end September 30, 2014 and will be submitted under separate cover. The following is a five-page executive summary of FFY 2013 CSBG Program which ended September 30, 2013.

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<u>Category</u>	<u>Use of Funds</u>	<u>Expended</u>
FFY 2013 Funds; Local Governments/Eligible Entities		\$ 2,823,761
FFY 2013 Funds; Wind River Reservation		\$ 289,275
FFY 2013 Funds; Federal Discretionary*		\$ 99,903
	Sub-total Program Expenditures	<u>\$ 3,212,939</u>
<u>State-level Administration:</u>		\$ 102,590
Operating Costs, Community Services Program		\$ 19,845
Indirect Costs, Department of Health		
	Total Expenditures	<u>\$ 3,335,374</u>
FFY 2013 Unexpended Funds; Returned to Office of Community Services		\$ 226,032

***Expenditures of Statewide 5% Federal Discretionary Funds**

<u>State Grantee</u>	<u>Amount</u>	<u>Purpose</u>
Cost Management Association Technologies	\$ 25,746	cmReporter & Tools
Sheela Schermetzler	\$ 3,137	CSBG Consultant
Albany County	\$ 9,040	Needs Assessment
Campbell County	\$ 6,200	Needs Assessment
Fremont County	\$ 6,500	DUI Agent, Substance Abuse Education, & Employee Training
Laramie County	\$ 10,020	Staff/Board Training
Natrona County	\$ 39,260	Conferences, Training, Education, Outreach, & Publications
TOTAL	<u>\$ 99,903</u>	

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<u>National Goals:</u>	%	Funds of Total	Expended:	People Assisted:
<u>Self-Sufficiency:</u>	21%	\$	674,717	6,218
<u>Community Development:</u>	17%	\$	546,199	5,034
<u>Stake-Holding:</u>	12%	\$	385,553	3,553
<u>Community Partnerships:</u>	17%	\$	546,200	5,034
<u>Capacity Building:</u>	12%	\$	385,553	3,553
<u>Family Stabilization:</u>	21%	\$	674,717	6,218
TOTALS:	100%		\$3,212,939	29,610

People Assisted = Unduplicated Counts

The number of people assisted represents unduplicated people to the extent possible. Unduplicated people are counted the first time a service is provided during the fiscal year. Each member of a family is counted separately if all are benefiting from the service. Additional services received by that person or family during the program year are not recorded in these unduplicated numbers.

Realistically, there will be some duplication in statewide compilations. Because of time and financial constraints and potential violations of client confidentiality, no attempt has been made to ascertain whether a person or family has received assistance through services in another Wyoming county.

Local Statewide Programs' Summary

Contractors Utilized	18
Service Providers Utilized	170

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Compilation of National Goals

Eligible entities and subcontractors are not expected to conduct activities or create services to reach each goal. It is understood that grantees provide a wide range of services directed at individuals, families, and community initiatives. In addition, the State and its grantees are continuously looking for ways to improve how to conduct business. Therefore, of the six national goals, each focuses on one of three areas:

- One client or family at a time (Client and Family);
- A community system or condition (Community); or
- An agency or program (Agency).

Goal I Low-Income People Become More Self-Sufficient (Self Sufficiency)

Number of grantees reporting this Goal: **95**

<u>Outcome Level:</u>	Client/Family
<u>Units of Measure:</u>	Consumers, clients, individuals, families, enrollees, participants, and households
<u>Type of Change:</u>	Status, family functioning, attainment, & achievement
<u>Dimensions of Change:</u>	Income, education, family functioning, transportation, employment, housing, basic needs, community involvement, substance abuse, childcare, and health

Goal II The Conditions in Which Low-Income People Live are Improved (Community Revitalization)

Number of grantees reporting this Goal: **74**

<u>Outcome Level:</u>	Community level
<u>Units of Measure:</u>	Wards, counties, townships, districts, neighborhoods, territories, and reservations
<u>Type of Change:</u>	Systems functioning, systems capacity, or community conditions
<u>Dimensions of Change:</u>	Public policy, equity, civic capital, service and support systems, and economic opportunity

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Goal III Low-Income People Own a Stake in Their Community (Community)

Number of grantees reporting this Goal: **52**

<u>Outcome Level:</u>	Community level
<u>Units of Measure:</u>	Wards, counties, townships, districts, neighborhoods, territories, and reservations
<u>Type of Change:</u>	Systems functioning, systems capacity, or community conditions
<u>Dimensions of Change:</u>	Public policy, equity, civic capital, service and support systems, and economic opportunity

Goal IV Partnerships among Supporters and Providers of Services to Low-Income People are Achieved (Agency)

Number of grantees reporting this Goal: **76**

<u>Outcome Level:</u>	Agency Level
<u>Units of Measure:</u>	Agency, program, employee groups, departments, projects, and bargaining units
<u>Type of Change:</u>	Capacity and/or performance
<u>Dimensions of Change:</u>	Governance, linkages and relationships, compliance, cultural sensitivity and diversity, equity, workforce environment, planning, measurement, and evaluation, external communications, and information management

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Goal V Agencies Increase Their Capacity to Achieve Results (Agency)

Number of grantees reporting this Goal: **52**

<u>Outcome Level:</u>	Agency Level
<u>Units of Measure:</u>	Agency, program, employee groups, departments, projects, and bargaining units
<u>Type of Change:</u>	Capacity and/or performance
<u>Dimensions of Change:</u>	Governance, linkages and relationships, compliance, cultural sensitivity and diversity, equity, workforce environment, planning, measurement and evaluation, external communications, and information management

Goal VI Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Support Systems (Client & Family Stability)

Number of grantees reporting this Goal: **95**

<u>Outcome Level:</u>	Client and family
<u>Units of Measure:</u>	Consumers, clients, individuals, families, enrollees, participants, and households
<u>Type of Change:</u>	Status, family functioning, attainment, and achievement
<u>Dimensions of Change:</u>	Income, education, family functioning, transportation, employment, housing, basic needs, community involvement, substance abuse, childcare, and health

Eligible entities and subcontractors are not expected to conduct activities or create services to reach each goal. It is understood that grantees provide a wide range of services directed at individuals, families, and community initiatives. In addition, the State and its grantees are continuously looking for ways to improve how to conduct business. Therefore, of the six national goals, each focuses on one of three areas:

- One client or family at a time (Client and Family);
- A community system or condition (Community); or
- An agency or program (Agency).

Consequently, if the services of a respective agency were designed to have an impact on low-income people one client or family at a time, they would not be expected to adopt a goal designed to measure a community condition or system. The same holds true if a respective agency is more directed toward community conditions or systems. They would adopt a goal designed to measure change in community systems or conditions. Obviously, some agencies may choose to direct their efforts to projects that relate to any combination of the three areas.

Local (Grantee) Systems Overview:

The following is a brief vignette of the local grantee (or eligible entity) and subgrantee (subcontractor) system and requirements. This section is not all-inclusive, inasmuch as local CSBG requirements are pervasive throughout this Plan. In short, the system that will serve as the basis for local CSBG operations has three primary components, (1) planning phase, (2) application phase, and (3) an operations and contract management phase.

Prospective grantees will be required to carry out specific planning activities. Briefly, these will consist of efforts to rank community problems in terms of their relative severity, based on a needs assessment; to analyze resources available to address such problems; to set priorities; and to identify both problem causes and strategies that could potentially be used to address the causes or problems. A summary of these activities will be included as part of the local application process to CSP.

All prospective grantees will be expected to submit application phase materials also. These will describe program purposes, goals, objectives, activities, strategies, and other information associated with the *WyoROMA* Process. This will also include information that will be used in later monitoring and evaluation.

The contract management phase will consist of those requirements and activities necessary to ensure that all CSBG expenditures meet accounting and management standards, in addition to those requirements that relate to efficiency and effectiveness of program performance.

Local grantees will be held responsible for ensuring that they will monitor their subgrantees both through desk monitoring (fiscal and performance reports) and on-site monitoring. Local grantees will be responsible for preparing and submitting the appropriate monthly fiscal and performance reports to CSP by the 10th day of each month, for the transactions and activities for the previous month. The reporting system will be closely monitored by CSP to ensure reports are correct and timely. It is the responsibility of the grantees (eligible entities) to establish procedures to assure that their subgrantees provide reports to them in a timely and accurate manner so that respective grantees' reports will be timely and accurate for the CSP.

A description of how local CSBG programs will perform these initiatives must be included in their local applications to CSP, and through their respective community action plans. Eligible entities must also describe how they will implement their signed assurances with regard to these initiatives.

Lastly, grantees and subgrantees must maintain their eligibility to receive CSBG funds, and must be in compliance with all applicable laws, regulations, requirements, and contractual agreements. This will apply whether the organization is directly receiving CSBG funds from CSP (a grantee or eligible entity), or whether they are involved in a subcontractual agreement with another grantee (a subgrantee, or subcontractor). CSP reserves the right to examine all aspects of CSBG and related operations of grantees and subgrantees at any time to ensure that this is the case.

(State) Review of Local Applications:

Because of the fact that eligible entities' funding applications or proposals are not competitive with each other, other than Federal Discretionary projects, the approval process by CSP will be a relatively simple one. If the applications are received within the established time limits and they fully comply with the provisions of the CSBG Act and the State Plan, they will be approved by CSP. As has been the case in the past, extensions may be granted for applications if formally requested by prospective grantees.

Applications must address adequately all of the criteria and requirements outlined in the State Plan. However, it is the position of CSP that voluminous applications that contain primarily rhetorical information, and/or "filler" are unnecessary. Simplicity, clarity, and common sense should prevail in the preparation of applications.

If initial applications are not satisfactory, prospective grantees will still have an opportunity for corrective action, as set forth by CSP.

Contract Process:

A Contract is the legal agreement which serves as the basis for the allocation of all CSBG funds. This document and its appropriate attachment, the Statement of Work, constitute a binding contractual agreement between CSP and a respective grantee (or eligible entity) once it is approved and signed by officials for both parties, and by the State Attorney General's Office.

Funding Award Procedures:

Annually, CSP will enter into a formal agreement with its grantees as soon as is practical after funding decisions are announced. Once the contract is signed by all parties (including the State Attorney General's Office) this contract will be binding on both parties, and the fund transaction process (voucher system) will begin.

Contingent upon receipt of CSBG funds from HHS/OCS, CSP will provide initial financial support for up to a quarter of funding in advance for sponsors. Subsequent funding will be provided, based on estimates of funding requirements contained in respective grantee's financial reports, and other appropriate information and data.

Funds must be expended by the ending date of the contract period agreed upon by the State and the grantee. Funds not expended by the ending date may not be carried over to the next program year.

Amendments:

Amendments to Contracts between the State and its grantees will be allowed to make adjustments in program goals and activities. Specifically, if a grantee or subgrantee feels the need to significantly change its local program, a written request must be made to CSP for disposition.

Any advice needed by local grantees or subgrantees as to whether or not its proposed amendments or waivers are "major" or "minor" in nature should be brought to the attention of CSP; who will then advise the respective grantee or subgrantee as to the proper procedure, formal or informal, for approval of the amendment or waiver request.

Appeals/Hearing Process for Clients or Applicants:

Any substantive decision by CSP, its eligible entities or subcontractors which an applicant for program services, or a program client believes to be unfair or unreasonable, and having a major adverse impact upon the applicant or client, may be appealed to CSP by the affected applicant or client.

Appeals/Hearing Process for Grantees or Subgrantees:

Any substantive decision by CSP which a state grantee or subgrantee believes to be unfair or unreasonable, and having a major impact on its local program may be appealed to CSP by the affected agency or organization.

Confidentiality:

Information gathered on people (i.e., applicants and/or clients on either a state level or local-level) will be treated as strictly confidential. Access will be limited strictly to those with legitimate need to administer and operate the CSBG Program; i.e. program staff, CSP staff, and/or other applicable local, state, or Federal Government reviewers, or any public or private sector designee of CSP.

Child Support Services and Referrals:

The CSBG Act added a provision that requires eligible entities and their subcontractors to:

1. inform custodial parents in single-parent families that participate in programs, activities, or services carried out under the CSBG program about the availability of child support services; and
2. refer eligible parents to the child support offices of the state and local governments.

The key to getting help with a child support case is knowing where to look for it. Offices providing child support services are located in 17 towns and cities in the state's nine judicial districts. The state office in Cheyenne is primarily administrative. Child support payments are processed through the clerk of the

district court offices in Wyoming's 23 counties and a single address location in Cheyenne. See Appendix M for specific locations.

Drug Testing:

The CSBG Act added a provision allowing the State to conduct drug testing on CSBG program participants in programs, activities, or services carried out under the CSBG program for controlled substances. If the State conducts the testing, it must inform participants who test positive for any substances about the availability of treatment or rehabilitation services and refer such participants for appropriate treatment or rehabilitation services and/or facilities.

Any funds provided for drug testing is considered to be expended for administrative expenses.

The term "controlled substance" has the meaning given the term in section 102 of the Controlled Substances Act (21 U.S.C. 802).

VI. APPENDICES

The following Section contains appendices that are crucial to this State Plan.